

# EXHIBIT A

**LTL ATTORNEYS LLP**

Enoch H. Liang (SBN 212324)  
601 Gateway Boulevard, Suite 1010  
South San Francisco, California 94080  
Tel: 650-422-2130  
Fax: 213-612-3773  
enoch.liang@ltlattorneys.com

James M. Lee (SBN 192301)  
Caleb H. Liang (Bar No. 261920)  
300 S. Grand Ave., 14th Floor  
Los Angeles, California 90071  
Tel: 213-612-8900  
Fax: 213-612-3773  
james.lee@ltlattorneys.com  
caleb.liang@ltlattorneys.com

**HUNG G. TA, ESQ. PLLC**

Hung G. Ta  
JooYun Kim  
250 Park Avenue, 7th Floor  
New York, New York 10177  
Tel: 646-453-7288  
hta@hgtlaw.com  
jooyun@hgtlaw.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:  
  
ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF ARMAN ANVARI IN  
SUPPORT OF MOTION TO WITHDRAW  
AS LEAD PLAINTIFF**

Date: March 7, 2019

Time: 1:30 p.m.

Crtrm: 3

Judge: Hon. Richard Seeborg

1 I, Arman Anvari, declare as follows pursuant to 28 U.S.C. § 1746:

2 1. On March 6, 2018, the Court appointed me as the Lead Plaintiff in this action, and my  
3 attorneys as the Co-Lead Counsel. Dkt. No. 101.

4 2. Since my appointment as Lead Plaintiff, I have actively participated in the litigation  
5 of this lawsuit, including:

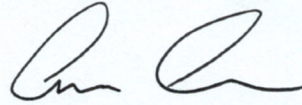
- 6 • reviewing, commenting on and revising drafts of the Consolidated Class Action  
7 Complaint filed on April 3, 2018 (Dkt. No. 108);
- 8 • reviewing the motions to dismiss filed by the Defendants (Dkt. Nos. 117, 119, 123,  
9 126), and commenting on and revising drafts of the opposition briefs filed by my  
10 attorneys in response to each of those motions to dismiss (Dkt. Nos. 132-135);
- 11 • engaging in substantial discovery efforts, including searching for and producing  
12 documents to Defendants in response to their document requests, and providing  
13 other discovery such as written responses to interrogatories and requests for  
14 admissions served by Defendants;
- 15 • numerous and regular meetings/communications in person and via telephone and  
16 email with my attorneys;
- 17 • involving myself in the one-day mediation between the parties that was conducted  
18 on December 14, 2018 by reviewing and commenting on the written mediation  
19 submissions and providing instructions to my attorneys during the mediation;
- 20 • approving the addition of named plaintiffs Pumaro LLC (“Pumaro”) and Artiom  
21 Frunze to this lawsuit (Dkt. Nos. 183 and 186);
- 22 • causing the filing of the Motion for Class Certification on January 9, 2019 (Dkt.  
23 No. 187), which seeks the appointment of Mr. Frunze and Pumaro as Class  
24 Representatives; and
- 25 • providing input into the strategy and direction of this case generally.

26 3. Based on various legal arguments which Defendants intend to make, however, I  
27 believe I will not be able to adequately represent the putative Class, and have instructed my attorneys  
28 to seek my withdrawal as Lead Plaintiff. I believe that Pumaro and Mr. Frunze, if appointed as Class  
Representatives, will capably represent the interests of the Class.

4. Until my withdrawal, I will continue to comply with my responsibilities as Lead  
Plaintiff, including agreeing to make myself available for a deposition, as Defendants have requested.

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge.

3 Executed this 23<sup>rd</sup> day of January, 2019 in Chicago, Illinois.

4  
5 

6 Arman Anvari